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Attorneys for Joshua Gray

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS
BANKRUPTCY DIVISION**

In re

IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC,

Debtor and
Debtor-in-Possession.

Case No. 1:24-bk-00002

**STIPULATION TO EXTEND BRIEFING
DEADLINES ON JOINT MOTION OF
DEBTOR AND OFFICIAL COMMITTEE OF
GENERAL UNSECURED CREDITORS
FOR ORDER (I) APPROVING THE
SALE OF SUBSTANTIALLY ALL OF
THE DEBTOR'S ASSETS FREE AND
CLEAR OF ALL LIENS, CLAIMS, AND
ENCUMBRANCES PURSUANT TO 11
U.S.C. § 363, SUBJECT TO OVERBIDS;
AND (II) AUTHORIZING THE
ASSUMPTION AND ASSIGNMENT OF
CERTAIN EXECUTORY CONTRACTS
AND CURE AMOUNTS ASSOCIATED
THEREWITH**

Hearing Date: March 25, 2025
Hearing Time: 9:00 a.m. (ChSt)
Judge: Hon. Robert J. Faris

Secured creditors Joshua Gray (“Gray”), the Commonwealth of the Northern Mariana Islands (the “CNMI”) (together, the “Secured Creditors”), the Official Committee of General Unsecured Creditors (the “Committee”), and the debtor and debtor in possession Imperial Pacific International (CNMI), LLC (the “Debtor”) (together, the “Parties”), through their counsel, hereby stipulate and agree:

1. The deadline for Gray and the CNMI to file a response or objection, if any, to the *Joint Motion of Debtor and Official Committee of General Unsecured Creditors for Order (I) Approving the Sale of Substantially All of the Debtor’s Assets Free and Clear of All Liens, Claims, and Encumbrances Pursuant to 11 U.S.C. § 363, Subject to Overbids; and (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Cure Amounts Associated Therewith* (the “Motion”) [ECF 367], shall be extended from March 5, 2025, at 6:00 p.m. (ChSt), to March 11, 2025, at 11:59 p.m. (ChST).

2. The deadline for the Debtor and Committee to file a reply to the Secured Creditors’ responses and objections (if any) to the Motion shall be March 18, 2025, at 11:59 p.m. (ChST).

3. The hearing on the Sale Motion shall remain on March 25, 2025, at 9:00 a.m. (ChST), or such later and further date as is convenient with the Court’s schedule if rescheduled by the Court.

1 Dated: February 28, 2025

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3 SIGNATURES:

4 /s/

5 Aaron Halegua

6 Bruce Berline

7 John-Patrick M. Fritz

Attorneys for Judgment Creditor Gray

8 /s/

9 J. Robert Glass, Jr.

Attorney for the CNMI

10
11 /s/

12 Aram Ordubegian

Attorney for the Official Committee of

13 *General Unsecured Creditors*

14
15 /s/

16 Chuck Choi

Attorney for the Imperial Pacific International (CNMI), LLC